

EXHIBIT 2

Litigation, Chris Mayberry, sent both employees emails attaching the Court's order and asking that they both attend their depositions as noticed on July 3 and 4.

5. Based on Mr. Nevarez and Mr. Talburt's actions, it appeared clear that both employees were attempting to avoid deposition and, previously, trial subpoenas.

6. Hours after Southwest's counsel sent the emails to Mr. Nevarez and Mr. Talburt, counsel for Plaintiff sent an email to counsel for all parties indicating that Mr. Nevarez, but not Mr. Talburt, had been served with the deposition subpoena.

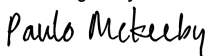
7. This timeline suggested that Mr. Nevarez was no longer avoiding service and Southwest, through the undersigned, directed its attention to securing the attendance at deposition of Mr. Talburt, who, based on reports I had received from Plaintiff's counsel, was still attempting to avoid service.

8. On the night of Saturday, July 2, 2022, I was finally able to connect with Mr. Talburt by telephone. After a conversation that lasted about an hour, I was able to convince Mr. Talburt to agree to appear voluntarily for deposition the next day as noticed.

9. Plaintiff's counsel took the deposition of Mr. Talburt on July 3, 2022.

10. Mr. Nevarez, despite being served and despite receiving the post-service reminder notice from Mr. Mayberry, failed to attend his deposition on July 4, 2022.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed in Dallas, Texas on July 26, 2022.

DocuSigned by:

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Paulo B. McKeeby